

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:
William E. Covington
Seneca Covington

Debtor(s)

Case No. 21-10693 ELF

Chapter 13

AJAX MORTGAGE LOAN TRUST 2021-G,
MORTGAGE-BACKED SECURITIES, SERIES
2021-G, BY U.S. BANK NATIONAL
ASSOCIATION, AS INDENTURE TRUSTEE

Movant

v.

William E. Covington
Seneca Covington

and

Kenneth E. West, Trustee

Respondents

NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE

Movant has filed a motion for relief from the automatic stay with the court to permit AJAX MORTGAGE LOAN TRUST 2021-G, MORTGAGE-BACKED SECURITIES, SERIES 2021-G, BY U.S. BANK NATIONAL ASSOCIATION, AS INDENTURE TRUSTEE to foreclose on 400 N. Charlotte Street, Pottstown, PA 19464.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before, August 30, 2022, you or your attorney must do all of the following:

- (a) file an answer explaining your position at: United States Bankruptcy Clerk,
United States Bankruptcy Court, 900 Market Street, Suite 400, Philadelphia, PA
19107.

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

- (b) mail a copy to the movant's attorney: Powers Kirn, LLC
8 Neshaminy Interplex, Suite 215
Trevose, PA 19053

2. If you or your attorney do not take these steps described in paragraphs 1(a) and 1(b) above, and

attend the hearing, the court may enter an order granting the relief requested in the motion.

3. A telephonic hearing on the motion is scheduled to be held before the Honorable Eric L. Frank on September 6, 2022 at 9:30 am. Parties may participate in the telephonic hearing by calling (877) 336-1828 and entering access code 1229352#.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at 215-408-2800 to find out whether the hearing has been cancelled because no one filed an answer.

Dated: August 15, 2022

/s/ Jill Manuel-Coughlin, Esquire

POWERS KIRN, LLC
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